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VIA ECF

May 4, 2012

Honorable Ramon Reyes  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Anthony Colandra  
10 Cr. 1008(BMC)

Dear Judge Reyes:

I represent Mr. Colandra who has a status conference scheduled May 9<sup>th</sup> 2012 today. By the agreement of the parties we are requesting that the conferences be adjourned for four (4) to six (6) weeks for several reasons. It is my understanding that the Government will be provided me with additional discovery in the near future, along with the fact that there are a number of discovery related issues which I need to discuss and hopefully resolve with the Government. If we can resolve those issues it may obviate the need for motion practice. I am aware that counsel for the Government is in the process of finishing a lengthy trial so these issues will not be resolved before May 9<sup>th</sup>. Additionally although I am available on the 9<sup>th</sup> but I am leaving the country (accompanying my wife on to an American Bar Association seminar) on that date. The defendant agrees and consents that the time between today and the next scheduled should be deemed excludable from the Speedy Trial clock.

Additionally I am requesting that Mr. Colandra who is currently released on a bond requiring house arrest while allowing him to go to his place of emolument be permitted to pick up his daughter who is finishing her freshmen year at college, the State University College of New York located at 101 Broad Street Plattsburgh New York and returning home for the summer. Mr. Colandra along with his wife with the permission of the Court intend to leave New York on Wednesday May 16<sup>th</sup> returning on Friday May 18<sup>th</sup>. They will be staying at the Comfort Inn located on Route 3 in Plattsburgh New York. Elizabeth Geddes the Assistant United States Attorney has graciously consented to this application. If the Court permits the travel Mr. Colandra will provide his full itinerary to Pre-Trial Services and contact them upon his return.

Respectfully submitted;

**PAPA, DEPAOLA & BROUNSTEIN**

*/s/*

**By: STEVEN L. BROUNSTEIN**

cc: Elizabeth Geddes